

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA) Criminal No. 5:24-CR-391 (BKS)
v.)
ROHAIL KHAN a/k/a ROHAIL KAHN,)
Defendant.) Information
) Violation: 18 U.S.C. § 242
) [Deprivation of Rights Under
) Color of Law]
)
) 1 Count
)
) County of Offense: Oneida

THE UNITED STATES ATTORNEY CHARGES:

Introduction

1. At all times relevant to this Information, Mid-State Correctional Facility (“Mid-State”) was a prison in Marcy, New York that housed inmates convicted of state crimes.
2. On or about the early morning of April 13, 2023, Defendant **ROHAIL KHAN** a/k/a **ROHAIL KAHN**, a corrections officer assigned to Mid-State, was working in Building 4.
3. Corrections Officer Trainee Michael Williams and Corrections Officer 1 were employed at Mid-State and were working the same shift as Defendant **KHAN** in the same building.
4. J.B. was an inmate housed in Building 4, Unit 4F in the early morning hours of April 13, 2023.

COUNT 1
[Deprivation of Rights Under Color of Law]

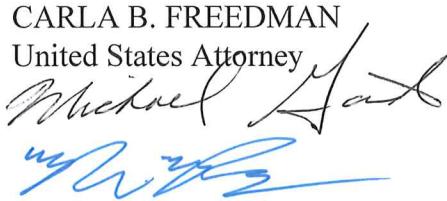
5. On or about April 13, 2023, in Oneida County in the Northern District of New York, the defendant, **ROHAIL KHAN a/k/a ROHAIL KAHN**, while acting under color of law and while aided and abetted by Corrections Officer Trainee Michael Williams and Corrections

Officer 1, willfully deprived J.B. of the right, protected and secured by the Constitution and laws of the United States, to be free from cruel and unusual punishment. Specifically, Defendant **KHAN**, aided and abetted by Corrections Officer Trainee Michael Williams and Corrections Officer 1, physically assaulted J.B. in the hallway outside Unit 4F. The offense resulted in bodily injury to J.B.

All in violation of Title 18, United States Code, Section 242.

Dated: October 29, 2024

By:

CARLA B. FREEDMAN
United States Attorney


Michael F. Perry (Bar Roll No. 518952)
Michael D. Gadarian (Bar Roll No. 517198)
Assistant United States Attorneys